

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

United States of America,

Plaintiff,

v.

Richard Sollars,

Defendant.

Case No. 19-20836

Honorable Mark A. Goldsmith

***EX PARTE UNOPPOSED MOTION TO FILE BRIEF IN  
EXCESS OF THE PAGE LIMIT***

Pursuant to Local Rule 7.1(d)(3)(A), Defendant Richard Sollars hereby moves for leave to file a motion to suppress evidence that exceeds the 25-page limit. Defendant seeks to file a brief that is 32 pages, inclusive of footnotes and signatures. Counsel for Defendant conferred with counsel for the United States, who does not oppose this motion.

Dated: May 3, 2023

Respectfully submitted,

/s/ Kevin M. Mulcahy

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**BRIEF IN SUPPORT OF *EX PARTE* MOTION TO  
FILE BRIEF IN EXCESS OF THE PAGE LIMIT**

This case involves allegations of bribery by the former mayor of the City of Taylor, Richard Sollars. Much of the evidence against Mr. Sollars resulted from two search warrants. The first focused on Mr. Sollars's iCloud account, while the second focused on his residence, lake house, and cellular phone. Mr. Sollars now moves to suppress the evidence obtained from both warrants. Rather than file two separate motions, the defense seeks permission to file a single motion seeking suppression of evidence from both warrants. The arguments for suppression—the lack of probable cause and the lack of good faith—overlap between the two motions. Therefore, in the interest of judicial economy, the defense seeks to file a single motion and brief. However, in order to address both warrants adequately, an additional seven pages is necessary.

WHEREFORE, Defendant Richard Sollars moves to expand the page limit for the brief in support of his motion to suppress evidence from 25 pages to 32 pages.

Dated: May 3, 2023

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### **CERTIFICATE OF SERVICE**

I hereby certify that on May 3, 2023, a copy of this motion was filed electronically. Notice will be sent to all the parties to this action through the Court's CM/ECF system.

/s/ Kevin M. Mulcahy

Kevin M. Mulcahy